

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,  
PELVIC REPAIR SYSTEM  
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A - B and Defendant C.R. Bard, Inc. ("Bard") advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and Bard jointly move the court to dismiss Bard as a defendant in these actions with prejudice, and terminate Bard from the docket in the actions, parties to bear their own costs. Other Defendants remain in these actions, and Plaintiffs will continue to prosecute these actions against them.

Respectfully:

/s/ Richard B. North, Jr.  
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/s/ A. Craig Eiland

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*Attorney for Plaintiffs on Exhibit B*

Dated: March 20, 2017

**EXHIBIT A – CLARK, LOVE & HUTSON, GP**

<b>CIVIL ACTION NUMBER (listed numerically in ascending order)</b>	<b>CASE NAME</b>
2:13-cv-11550	Donna Stephens and Gary Stephens v. C.R. Bard, Inc., et al.
2:15-cv-03993	Helen Freytag and Wallace Freytag v. C.R. Bard, Inc., et al.
2:15-cv-08871	Carol Lawrence and Rickey Lawrence v. C.R. Bard, Inc., et al.

**EXHIBIT B – THE LAW OFFICES OF A. CRAIG EILAND, PC.**

<b>CIVIL ACTION NUMBER (listed numerically in ascending order)</b>	<b>CASE NAME</b>
2:14-cv-04587	Peggy Zeigler v. C.R. Bard, Inc., et al.

**CERTIFICATE OF SERVICE**

I hereby certify that on March 20, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Richard B. North, Jr.